

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PAYMENT ALLIANCE INTERNATIONAL, INC.,

Plaintiff,

- against -

MANUEL FERREIRA

Defendant.

) Index No.: 07 CIV 8685 (B.S.J.)

) Hon. Barbara Jones

)
)
) MOTION TO ADMIT
) COUNSEL

)
) PRO HAC VICE
)
)

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Peter M. Falkenstein, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: Eric A. Linden
Firm Name: Jaffe, Raitt, Heuer & Weiss, PC
Address: 27777 Franklin Road, Suite 2500
City/State/Zip: Southfield, Michigan 48034
Phone Number: (248) 351-3000
Fax Number: (248) 351-3082

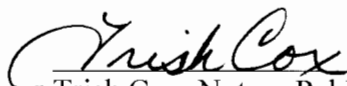
Eric A. Linden is a member in good standing of the Bar of the States of Michigan and Florida.

There are no pending disciplinary proceedings against Eric A. Linden in any State or Federal court.

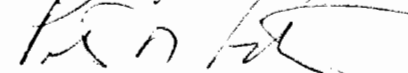
Dated: October 25, 2007

Southfield, Michigan

Subscribed and sworn to before me
on October 25, 2007.


Trish Cox, Notary Public
Wayne County, Michigan
Acting in Washtenaw County, MI
My commission expires: 10/06/2011

Respectfully submitted,


Peter M. Falkenstein
SDNY Bar 2256212
Firm Name: Jaffe, Raitt, Heuer & Weiss PC
27777 Franklin Road, Suite 2500
Southfield, MI 48034
Phone Number: (248) 351-3000
Fax Number: (248) 351-3082

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAYMENT ALLIANCE INTERNATIONAL, INC.,

Plaintiff,

- against -

MANUEL FERREIRA

Defendant.

)
) **Index No.: 07 CIV 8685 (B.S.J.)**
) **Hon. Barbara Jones**
)
) **ORDER FOR ADMISSION**
) ***PRO HAC VICE***
) **ON WRITTEN MOTION**

Upon the motion of Peter M. Falkenstein, attorney for Defendant, Manuel Ferreira, and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Applicant's Name:	Eric A. Linden
Firm Name:	Jaffe, Raitt, Heuer & Weiss, PC
Address:	27777 Franklin Road, Suite 2500
City/State/Zip:	Southfield, Michigan 48034
Telephone/Fax:	(248) 351-3000 (248) 351-3082
Email Address:	elinden@jaffelaw.com

is admitted to practice *pro hac vice* as counsel for Defendant, Manuel Ferreira, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: October 23, 2007

Southfield, Michigan

United States District/Magistrate Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAYMENT ALLIANCE INTERNATIONAL, INC.,

Plaintiff,

- against -

MANUEL FERREIRA,

Defendant.

)
) **Index No.: 07 CIV 8685 (B.S.J.)**
) **Hon. Barbara Jones**
)
) **AFFIDAVIT OF**
) **PETER M. FALKENSTEIN**
) **IN SUPPORT OF MOTION**
) **TO ADMIT COUNSEL**
) **PRO HAC VICE**
)
)
)

STATE OF MICHIGAN)

) **ss:**

COUNTY OF WASHTENAW)

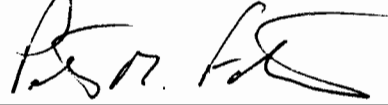
Peter M. Falkenstein, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Defendant in the above-captioned action. I am somewhat familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Eric A. Linden as counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in February, 1989. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known Eric A. Linden since 2001.
4. Mr. Linden is a shareholder of Jaffe, Raitt, Heuer & Weiss, PC., in Southfield, Michigan.
5. I have found Mr. Linden to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Eric A. Linden, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Eric A. Linden, *pro hac vice*, to represent Defendant in the above-captioned matter, be granted.

Dated: October 24, 2007
Ann Arbor, Michigan

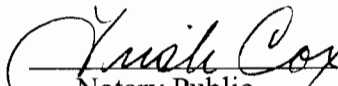
Respectfully submitted,



Peter M. Falkenstein

SDNY Bar Code: 2256212

Sworn to before me this 24th day of October, 2007.


Notary Public

State of Michigan, County of Washtenaw.

My commission expires on 10/6/2011.

TRISH COX
Notary Public, State of Michigan
County of Wayne
My Commission Expires Oct. 6, 2011
Acting in the County of Washtenaw

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PAYMENT ALLIANCE INTERNATIONAL, INC.,)	
)	Index No.: 07 CIV 8685 (B.S.J.)
Plaintiff,)	Hon. Barbara Jones
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- against -)	
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MANUEL FERREIRA,)	
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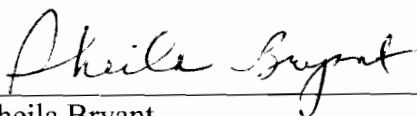
**DEFENDANT MANUEL FERREIRA'S
CERTIFICATE OF SERVICE**

JAFFE RAITT HEUER & WEISS, P.C.
27777 Franklin Road, Suite 2500
Southfield, Michigan 48034
248.351.3000

Attorneys for Defendant
Manuel Ferreira

I, Sheila Bryant, hereby certify that I am employee of Jaffe, Raitt, Heuer & Weiss, PC,
and that I served or caused to be served, **via first-class mail**, on October 29, 2007, **Defendant
Manuel Ferreira's Motion To Admit Counsel *Pro Hac Vice*, Order For Admission,
Affidavit of Peter M. Falkenstein In Support of Motion** and this **Certificate of Service** upon

Plaintiff's attorneys, Lyle S. Zuckerman, Kauff, McClain & McGuire, LLP, 950 Third Avenue –
14th Floor, New York, NY 10022.



Sheila Bryant

Sworn and subscribed to
before me this 5th day of
November, 2007.



Notary Public Acting in Orleans County





The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 357758
Eric Arthur Linden
Jaffe Raitt Heuer & Weiss, P.C.
27777 Franklin Rd., Ste. 2500
Southfield, MI

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on December 27, 1982.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 17th day of October, 2007.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/lvm40i:R10

State Bar of Michigan

Certificate of Good Standing



This certifies that Eric A. Linden, P33249 of Southfield, Michigan is an active member of the State Bar of Michigan in good standing. He was admitted to practice in Michigan on November 18, 1981 in Oakland County and became a member of the State Bar of Michigan on November 18, 1981.

Janet K. Welch
Executive Director
October 22, 2007

